

1 MICHAEL N. FEDER
Nevada Bar No. 7332
2 **DICKINSON WRIGHT PLLC**
8363 West Sunset Road, Suite 200
3 Las Vegas, NV 89113
Telephone: 702-550-4440
4 Facsimile: 844-670-6009
Email: mfeder@dickinson-wright.com

5 MARTIN D. HOLMES (*Admitted Pro Hac Vice*)
Tennessee Bar No. 012122
6 PETER F. KLETT (*Admitted Pro Hac Vice*)
Tennessee Bar No. 012688
7 **DICKINSON WRIGHT PLLC**
Fifth Third Center, Suite 800
8 424 Church Street
Nashville, TN 37219
9 Telephone: 615-244-6538
10 Facsimile: 844-670-6009
Email: mdholmes@dickinsonwright.com
11 pklett@dickinsonwright.com

12 *Attorneys for Plaintiffs, Putative Collective Class Members*
13 *and Putative Hawaii Class Members*

14 Howard E. Cole
State Bar No. 4950
15 Jennifer K. Hostetler
State Bar No. 11994
16 **LEWIS ROCA ROTHGERBER CHRISTIE LLP**
3993 Howard Hughes Pkwy., Suite 600
Las Vegas, NV 89169-5996
17 Tel: 702.949.8200
Fax: 702.949.8398
18 E-mail: hcole@lrrc.com
Email: jhostetler@lrrc.com

19 Kirstin E. Muller*
20 Alison M. Hamer*
Benjamin J. Treger*
21 California State Bar No. 285283
HIRSCHFELD KRAEMER LLP
22 233 Wilshire Boulevard, Suite 600
Santa Monica, CA 90401
23 Tel: 310.255.0705
Fax: 310.266.0986
24 E-mail: kmuller@hkemploymentlaw.com
E-mail: ahamer@hkemploymentlaw.com
25 E-mail: btreger@hkemploymentlaw.com
*Has complied with LR IA 11-2

26 *Attorneys for Defendants*
27
28

1 UNITED STATES DISTRICT COURT,
2 DISTRICT OF NEVADA
3

4 DANIEL GONZALEZ and JEFFREY
5 HUGHES,

6 Plaintiffs,

7 vs.

8 DIAMOND RESORTS
9 INTERNATIONAL MARKETING, INC.,
10 DIAMOND RESORTS
INTERNATIONAL, INC., DIAMOND
RESORTS CORPORATION, and WEST
MAUI RESORTS PARTNERS, L.P.,

11 Defendants.
12

Case No. 2:18-cv-00979-GMN-VCF

**JOINT MOTION FOR SEVEN-DAY
EXTENSION TO SUBMIT A
PROPOSED DISCOVERY PLAN AND
SCHEDULING ORDER**

13 The parties file this Joint Motion for a Seven-Day Extension to Submit a Proposed
14 Discovery Plan and Scheduling Order. This is the second request for extension. The original
15 deadline was October 22, 2016. The current deadline is October 26, 2018. The parties request an
16 extension through November 2, 2018.

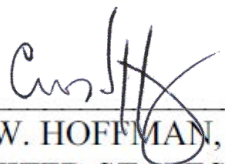
17 The parties have worked amicably to develop a proposed discovery plan and scheduling
18 order and have made substantial progress in that regard. The parties, however, need additional time
19 to work out the final details, including the possibility of an early resolution of this case through
20 mediation.

21 Accordingly, the parties request a seven-day extension from October 26, 2018 to
22 November 2, 2018.

23 Dated: October 26, 2018.

IT IS SO ORDERED.

24 DATED: Oct 30, 2018

25
26 
27 C.W. HOFFMAN, JR.
28 UNITED STATES MAGISTRATE JUDGE

1 DICKINSON WRIGHT PLLC

HIRSCHFELD KRAEMER LLP

2
3 /s/ Martin D. Holmes

/s/ Alison Megan Hamer

4 MICHAEL N. FEDER

ALISON M. HAMER

5 Nevada Bar No. 7332

(Admitted Pro Hac Vice)

8363 West Sunset Road, Suite 200

California Bar No. 258281

Las Vegas, NV 89113

BENJAMIN J. TREGER

(Admitted Pro Hac Vice)

California Bar No. 285283

6 MARTIN D. HOLMES

KIRSTIN E. MULLER

7 (Admitted Pro Hac Vice)

(Admitted Pro Hac Vice)

8 Tennessee Bar No. 012122

California Bar No. 186373

9 PETER F. KLETT

Hirschfeld Kramer LLP

10 (Admitted Pro Hac Vice)

233 Wilshire Boulevard, Suite 600

11 Tennessee Bar No. 012688

Santa Monica, California 90401

Fifth Third Center, Suite 800

HOWARD E. COLE

12 424 Church Street

Nevada Bar No. 4950

13 Nashville, TN 37219

JENNIFER K. HOSTETLER

Nevada Bar No. 11994

14 *Attorneys for Plaintiffs, Putative Collective*
15 *Class Members and Putative Hawaii Class*
16 *Members*

3993 Howard Hughes Pkwy, Suite 600
Las Vegas, NV 89169-5996

Attorneys for Defendants

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on October 26, 2018, I caused a true and accurate copy of the foregoing, JOINT MOTION FOR FOUR-DAY EXTENSION TO SUBMIT A PROPOSED DISCOVERY PLAN AND SCHEDULING ORDER, to be filed with the Clerk of the Court via the Court's CM/ECF system, which sent an electronic copy of the same to the following counsel of record:

Michael N. Feder
DICKINSON WRIGHT PLLC
8363 West Sunset Road, Suite 200
Las Vegas, NV 89113
Phone: (702) 550-4440
Fax: (844) 670-6009
Email: mfeder@dickinson-wright.com

Martin D. Holmes
Peter F. Klett
DICKINSON WRIGHT PLLC
Fifth Third Center, Suite 800
424 Church Street
Nashville, TN 37219
Phone: (615) 244-6538
Fax: (844) 670-6009
Email: mdholmes@dickinsonwright.com
Email: pklett@dickinsonwright.com

Howard E. Cole
Jennifer K. Hostetler
LEWIS ROCA ROTHGERBER CHRISTIE LLP
3993 Howard Hughes Pkwy., Ste. 600
Las Vegas, NV 89169-5996
Phone: (702) 949-8200
Fax: (702) 949-8398
Email: hcole@lrrc.com
Email: jhostetler@lrrc.com

Alison Megan Hamer
Benjamin Joseph Treger
Kirstin Elisabeth Muller
HIRSCHFELD KRAMER LLP
233 Wilshire Boulevard, Suite 600
Santa Monica, California 90401
Phone: (310) 255-0705
Fax: (310) 255-0986
Email: ahamer@HKemploymentlaw.com
Email: btregger@HKemploymentlaw.com
Email: kmuller@HKemploymentlaw.com

Dated this 26th day of October, 2018.

s/ Alison Megan Hamer
ALISON M. HAMER